00000

8/30/0

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION REPORT

I. HEADING

DATE: August 30, 2001

SUBJECT: MichCon, South Green Avenue Site: 201 South Green Avenue, Detroit, MI

FROM: R. Dollhopf, OSC, U.S. EPA, Region 5, ERB, Grosse Ile, MI
Ross Powers, OSC, U.S. EPA, Region 5, ERB, Grosse Ile, MI

TO: C. Stantion, U.S. EPA, OSWER, Washington, DC ..... (stantion.colby@epa.gov)
R. Karl, Chief, U.S. EPA, ERB, Chicago, I ..... (karl.rick@epa.gov)
J. El-Zein, Section Chief, U.S. EPA, RS1, Grosse Ile, MI ..... (el-zein.jason@epa.gov)
W. Messenger, Section Chief, U.S. EPA, ERB, Chicago, IL. .(messenger.william@epa.gov)
C.Ropski, U.S. EPA, ERB, ESS, Chicago, IL ..... (ropski.carol@epa.gov)
A. Marouf, U.S. EPA, H&S, Chicago, IL ..... (marouf.afif@epa.gov)
R. Scott, DEA, City of Detroit, MI ..... (scottr@EnvAfrs.ci.detroit.mi.us)
Duty Officer, NRC, Washington, DC. ..... (duty.officer@epa.gov)
T. Smith, U.S. EPA, Grosse Ile, MI. ..... (smith.tracy@epa.gov)
D. Fisher, PDD, City of Detroit, MI ..... (DFisher@pdd.ci.detroit.mi.us)

POLREP NO. 3

Start Date: PRP removal action started on August 13, 2001.

II. BACKGROUND

Site No.:	B552
Delivery Order Number:	Not Applicable
Response Authority:	CERCLA
NPL Status:	Not on NPL
MDEQ Notification:	Yes
Latitude Longitude:	42°17:59.780North / 83° 06:40.216west
Start Date:	August 13, 2001
Completion Date:	Pending

III. SITE INFORMATION

A. Incident Category

(PRP) Site Removal

B. Site Description

1. Site Location

The South Green Avenue Site (subsequently referred to as the "Site") is at 201 South Green Avenue, southwest Detroit, Wayne County, MI.

2. Description of Threat

In 1997, more than 30 drums and barrels were observed on the Site. According to the United States Environmental Protection Agency 's (U.S. EPA) Superfund Technical Assessment and Response Team (START), the drums contained brown and white grease-

like substances, solid polymer substances, dark colored solids with a soil consistency, and white colored solids similar to dried grease. Some of the drums were leaking. In addition partially buried drums and vehicle gasoline tanks, piles of asphalt shingles, container of asphalt driveway and roofing compounds, abandoned vehicle, at least 200 tires, and other debris were noted at the Site. In November 1997, 37 drums from the Site were removed by Michigan Department of Environmental Quality(MDEQ). MichCon has no record of the equipment containing polychlorinated biphenyls (PCB). PCB containing capacitors were found beneath the high voltage lines on the property and immediately east to the Site.

In February 1998, the U.S. EPA inspected the Site and issued an Action Memoranda stating that the conditions at the Site presented an imminent and substantial endangerment to human health or welfare or the environment. The U.S. EPA conducted removal actions at the Site that included removing surface debris and soils impacted with PCBs. The U.S. EPA submitted a draft Administrative Order by Consent (AOC) to MichCon. The AOC directed MichCon to conduct an Engineering Evaluation Cost Analysis (EE/CA) for the purpose of evaluating the need for additional removal actions at the Site. Several removal actions were evaluated and the excavation/off-site disposal alternative was recommended.

IV. RESPONSE INFORMATION

A. Situation

1. Current situation:

MichCon contracted IT Corporation (IT) and MPS Industrial and Environmental Services (MPS) to perform the onsite removal actions. IT completed a work plan, health and safety plan, air monitoring plan, and an emergency contingency plan. U.S. EPA and START contractor Tetra Tech EM Inc. (Tetra Tech) and Tetra Tech's subcontractor, Altech Environmental Services Inc. (Altech), have reviewed these documents. IT will conduct all field activities including Site documentation, air monitoring, and technical and administrative support. MPS will perform the removal actions. START will conduct site documentation, air monitoring, and technical and administrative support.

2. Site activities to date:

On Monday July 31, 2001- a "kick-off" meeting was held at the Site. The meeting was attended by representatives of U.S. EPA, MichCon, IT , MPS and Altech. During the meeting the scope and schedule of the excavation area were discussed. U.S. EPA stated that all monitoring wells located within the excavation area that would be removed during excavation activities will require documentation. IT will provide documentation of all wells removed at the end of excavation activities.

During the period from August 1 through August 13, site preparation activities were conducted including brush hogging, marking of excavation limits, set up of the site trailer and construction of access road. On August 1, 2001, IT personnel collected samples from the liquids in the tar well, on the west side of the Site, for waste characterization analysis. A composite waste characterization groundwater sample was collected from MW-3, MW-4 and MW-10 on August 8, 9 and 13, 2001 within in the excavation area for disposal approval from Dynecol, Inc. Water pumped from the excavation and tar well during excavation activities will be disposed of at Dynecol, Inc. after disposal approval.

On August 9, 2001 Altech received a letter that contained the excavation schedule from IT. Excavation activities began on August 14, 2001. During the period of August 1 through 13, 2001, START mobilized the air monitoring equipment, PPE, transportation, and other supplies needed for start-up.

- START mobilized to Site on August 14, 2001. IT installed three air monitoring stations, one at the north corner of the Site and two at the east and west corners of the Site. A safety tailgate meeting was conducted and a safety plan was signed by all personnel. START screened and noted the background air concentrations for volatile organic compounds (VOCs) using a photo ionization detector (PID) and flame ionization detector (FID) and dust using a personal data ram (PRD). At about 0730 MPS started excavation activities at the southeast corner of the removal action area. The excavation proceeded south exposing part of the foundation of an oil and tar separator. MW-3 was excavated. A 24" diameter steel pipe running across the excavation was exposed and punctured, the content spilled into the excavation. The olfactory indication showed the presence of hydrocarbons and PID FID readings were noted. Excavation depth averaged 8 feet below ground surface (bgs). During excavation activities air monitoring was conducted by IT and START. Dust generated from the trucks and occasionally high winds started to become an issue; therefore, IT was also asked to install a proper weather monitoring station instead of the present wind sock. IT was also asked to install another air monitoring station at the south end of the Site for representation of air flow and dust migration. Clean fill was transported to the Site and dumped at the northeast corner of the Site. IT collected soil samples from the clean fill for analysis and a compaction testing.

On August 15, 2001, a new air monitoring station was installed at the south corner of the Site with an electronic weather station at the site trailer. A truck with an attached water tank was brought to Site for dust control. Excavation activities proceeded south along the boundary of the removal action area, approaching MW-10. START collected confirmation soil samples designated SW1 and SW2 from the southeast sidewall of the excavation of the removal action area. Soil sample SW2 was collected from under the 24" diameter steel pipe. No significant PID FID readings were noted in the sample area. A frac tank was brought to Site to pump liquid from the excavation and the contents were sampled and sent to the laboratory for analysis.

From August 16 through August 17, 2001, excavations continued on south and east side of the removal action area exposing part of the foundation of the 200,000 cu. ft. gas holder. The gas holder had cracks and soil around the foundation appeared very dark and loose with an oil sheen at about 8 feet bgs. MW-4 was removed. A 12"-diameter pipe that ran across the excavation was broken. The pipe drained storm water from a manhole on South Green Avenue. IT will plug all abandoned piping according to code before backfilling. START collected confirmation soil samples designated SW4 and SW5 from the southeast side wall of the excavation. Part of the foundation for the oil and tar separator was excavated.

On August 20, 2001, four 55-gallon drums were exposed inside the 200,000 cu. ft. gas holder foundation during excavations activities . The content appeared very dark and tar-like. There was yellowish liquid found draining from one of the drums. Olfactory indications showed the presence of hydrocarbons and PID/FID showed 0.0 ppm at the breathing zone. Between August 21 and 22, 2001, five 55-gallon drums were exposed north of the gas holder foundation. The content of one of the drums appeared milky with pungent smell. PID/FID readings showed no indication of presence of VOCs at the breathing zone. A peak reading of 7.5 ppm was detected with the probe 6 inches away from the drum. Excavation activities in the area containing the drums were stopped until the health and safety plan was amended.

On August 23, 2001 excavation continued on the north side of the removal action area. A network of piping was exposed and excavated. PID readings on this part of excavation were between 2.5 ppm and 5.1 ppm for a period of 5 minutes in the breathing zone. IT conducted air monitoring to check for presence of benzene. There was no indication of benzene in the breathing zone. Part of the foundation for the water gas plant and two tar traps were excavated. The excavation proceeded west exposing part of the 75,000 cu. ft.

gas holder foundation. Cracks were observed on the gas holder foundation. There was no visual indication of rebar in the gas holder foundation. The draft of the health and safety plan amendment regarding drum handing was reviewed. Darrell Grassmyer of MichCon indicated that pipes encountered during excavation activities would be crushed with the loader and loaded into trucks with the impacted soil for transportation to the landfill. START collected a confirmation soil sample designated SW 7 from the northeast sidewall removal action area.

On August 24, 2001, excavation activities continued around the 75,000 cu. ft. gas holder foundation. Excavation proceeded west exposing the oil house foundation. Half of the oil house foundation was observed to be directly inside the western part of the the 75,000 cu. ft. gas holder foundation. The oil house is approximately 15 ft. long, 12 ft. wide, and a depth of 5 ft. The oil house foundation had an outer concrete structure and the inside was lined with bricks. The content of the oil house appear tar-like and was loaded into trucks with the impacted soil for transportation to the landfill. The oil house foundation was excavated and transported off site. Part of the concrete foundation for the gas holder was broken exposing soil. A portion of the spray pond foundation was excavated.

On August 27, 2001, a meeting with U.S. EPA, IT, Tetra Tech, Altech and MPS representatives was held to discuss the final amendment of the health and safety plan regarding drum handling activities. MPS designated an area close to the excavated drums as the staging area. A hot zone, decontamination zone and clean zone were established. Minimum level of "B" PPE was established for all personnel dealing directly with drums. The two tar traps and all the exposed drums were staged at the staging area. Two MPS personnel were designated to conduct the drum handing activities. One other MPS personnel was designated to serve as a support team. IT served as an observer in the support team. MPS conducted perimeter and individual air monitoring on the staged drums. The air monitoring was conducted for LEL, presence of VOCs, and cyanide at the breathing zone of the staging area. Composite sample of seven 55-gallon drums with tar-like substances and the two tar traps were collected and sent to Philips Services for characterization. Excavation in the 200,000 cu. ft. gas holder foundation exposed six more 55-gallon drums with tar like substances. The six 55-gallon drums were composited and sampled. All drums with tar-like substances were collected in a roll off box and covered with a plastic sheeting. Two drums with yellowish substances were left on plastic sheeting and properly covered.

More excavations activities for drums continued on August 28, 2001. MPS was on site with two personnel designated to work in the hot zone and two personnel as a support team. Further excavations activities in the 200,000 cu. ft. gas holder exposed eleven 55-gallon drums, three 5-gallon pails with tar like substances, and a bag of white powder substance. The drums, the pails and the white substances were staged in the staging area. Air monitoring for VOCs , LEL and cyanide were conducted at the breathing zone of the staging area. A composite sample of eleven 55-gallon drums and the three 5-gallon pails with tar-like substances were collected. The content of the two drums with the yellowish substances and the bag with white powder were sampled. All samples collected were sent to Philips Services for characterization. The eleven 55-gallon drums and the three 5-gallon pails with tar like substances were collected in a roll off box. The two drums with the yellowish substances was collected in a lined gaylord box and the bag with white powder collected in a 55-gallon drum. De-watering of the excavation continued.

B. Planned Removal Activities

IT and MPS will continue excavation activities and soil removal, and waste disposal following laboratory analytical results from the sidewall samples and waste characterization of the contents of the excavated drums.

C. Next Steps

START will continue oversight until site activities have ceased.

D. Key Issues

To date, the oil and tar separator, the oil house foundation have been completely removed. Part of the 200,000 cu. ft. gas holder and 75,000 cu. ft. gas holder foundations, the water gas plant foundation and the spray pond foundations have been encountered. Contamination of soil under the gas holder is suspected. MPS will be removing the two gas holder foundations.

V. COST INFORMATION

Estimated costs as of August 13, 2001:

START	$16,250
U.S. EPA	

VI. DISPOSITION OF WASTES

As of August 21, 2001: 91 truck loads of impacted soil have been transported offsite to Carlton Farms Landfill in Clinton, Michigan. As of August 27, 2001: 29,100 gallons of Non Hazardous Waste Liquid have been transported to Dynecol, Inc. in Detroit, Michigan.